

Bank of America Tower
50 N. Laura Street, Suite 2600
Jacksonville, Florida 32202
Main: 904 598-6100
www.sgrlaw.com

SMITH, GAMBRELL & RUSSELL, LLP
Attorneys at Law

Scott S. Gallagher
Direct Tel: (904) 598-6111
Direct Fax: (904) 598-6211
sgallagher@sgrlaw.com

December 12, 2019

VIA CM/ECF

Honorable Frederic Block, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Avrohom Bluming v. Enhanced Recovery Company, LLC
Civ. Case No.: 1:18-cv-03517(FB)(RLM)

Dear Judge Block:

I represent Enhanced Recovery Company, LLC ("ERC") in the above-referenced matter. I write pursuant to the Court's instructions given at the December 5, 2019 pre-motion conference to submit a proposed briefing schedule for ERC's forthcoming motion for sanctions by today.

I have conferred with opposing counsel and the parties have agreed on the following briefing schedule:

- ERC to serve its motion and memorandum of law on or before December 13, 2019;
- Mr. Bluming to serve his opposition on or before January 27, 2020; and
- ERC to serve its reply brief, if any, by February 10, 2020.

The parties request the Court to accept the proposed briefing schedule.

Respectfully submitted,


Scott Gallagher

cc: Adam J. Fishbein, Esq. (*Via CM/ECF*)

